



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JUL 27 1999

Mr. Gilbert G. Espinoza
Avonite, Inc.
1945 Hwy 304
Belen, NM 87002

Ref. No. 99-0064

Dear Mr. Espinoza:

This is in response to your letter dated April 8, 1998, regarding dual markings on packages containing hazardous materials described as "Consumer Commodity, ORM-D" under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You requested our review of an enclosed drawing showing a package marked with "CONSUMER COMMODITY, ORM-D", "CONSUMER COMMODITY, ORM-D-AIR", "CONSUMER COMMODITY, ID 8000," and bearing a CLASS 9 label. The package is intended for transportation by highway, air, or vessel.

The HMR do not prohibit more than one marking on packages containing hazardous materials. So as not to reduce the effectiveness of these markings, we suggest that the markings be placed on opposite sides of the package. However, the orientation arrows depicted in your drawing do not conform pictorially to the ISO Standard 780-1985, as prescribed in 49 CFR 172.312.

For your information, if all inner packagings meet 49 CFR 173.27, packages intended for materials described as "Consumer commodities, ORM-D," may be marked "ORM-D-AIR" regardless of whether they are transported by aircraft (See 49 CFR 172.316(a)(1) and 49 CFR 173.27).

I hope this satisfies your inquiry.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



990064

172-301

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\$ 172.301
99-0064

April 8, 1999

U.S. DOT
RESEARCH & SPECIAL PROGRAMS
ADMINISTRATION OFFICE OF HAZARDOUS
MATERIAL STANDARDS (DHM-10)
400 7TH ST S.W.
WASHINGTON, D.C. 20590-0001

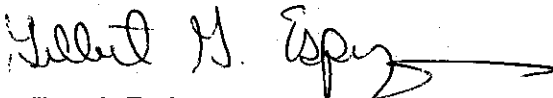
Dear Helen Ingram:

As you know we are currently looking at having our box manufacturer make 1 universal box for shipping Consumer Commodity shipments through Air, Ground, and Ocean shipments. Could you please comment on attached schematic, and make changes if need be! A large percent of these shipments will be going UPS and Federal Express, please let me know if these packages will be acceptable.

Could you please fax over corrections/recommendations, along with supporting Regulations from:

- CRR 49 PARTS 100 TO 185
- ICAO
- IATA

Thank you,



Gilbert G. Espinoza
Traffic/Shipping Supervisor